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PLEASE REPLY TO: SAN FRANCISCO

March 5, 1991

Mr. David M. Jones
Assistant Regional Counsel
Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

RE: Petroleum Recycling Corporation
Docket No. TSCA-09-91-0002

Dear Mr. Jones:

This follows-up on our meeting of February 20, 1991.

Enclosed is a list of the laboratory equipment (including manufacturer's names and model numbers) presently located at PRC's Signal Hill, Fontana, and Patterson facilities. Ms. Marcy Katzin requested this information during our meeting, and we agreed to send it to you.

At the close of our meeting, we discussed a \$20,000 reduction of the proposed \$45,000 civil penalty, through implementation of acceptable environmentally beneficial expenditures. For this penalty reduction, PRC is willing to implement the following programs which will benefit the environment and which are not required under any federal, state or local rule, regulation or ordinance:

1. Community Environmental Education

A. Kindergarten\Elementary School Level Education

PRC will distribute to Signal Hill elementary schools a six to ten page coloring book (possibly with crayons) which shows in simple, basic pictures and text, the proper handling of household generated used oil. A simple suggested lesson plan will accompany the coloring books. The lesson plan and coloring book will be a tool for elementary teachers to use in introducing environmental concepts to their students.

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The coloring books and lesson plan will be made available for the 1991/92 school year. The estimated cost is \$7,500.

B. Elementary\Middle School Level Education

PRC will offer to Signal Hill elementary and middle schools a thirty to sixty minute presentation (depending on the age of the students) on recycling, featuring Mr. Oil Drop. The presentation will discuss the environmental benefits of recycling paper, aluminum, glass, and oil. Oil disposal kits will be distributed to the students, as appropriate.

Mr. Oil Drop will be available for the 1991/92 school year. The estimated cost is \$14,250.

C. Community Education

PRC will encourage the communities surrounding its Signal Hill, Fontana and Patterson facilities to recycle oil, aluminum, glass and paper through placing advertisements in local newspapers. The advertisements will be educational in nature and will encourage residents to contact resource centers (PRC as well as others) for further information on local recycling programs.

The informational advertisements will be placed quarterly, with the first being placed during the third quarter of 1991. The estimated cost is \$5,000.

2. Community Support

✓ A. Oil Recycling

PRC will arrange to accept free-of-charge, used oil from Signal Hill homeowners during certain hours of the day. PRC will also make available to homeowners, free-of-charge, oil disposal kits. These oil disposal kits, known as dispoil kits, are completely recyclable.

PRC will begin accepting used oil generated by homeowners during the third quarter of 1991. The estimated cost to set-up this program and run it for two years is \$7,500. —

B. Community Recycling Centers

PRC will offer guidance to communities wishing to set-up recycling programs. PRC's guidance will consist of

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facilitating the implementation of a recycling program with the goal that the community will run the program itself once the program is successfully implemented.

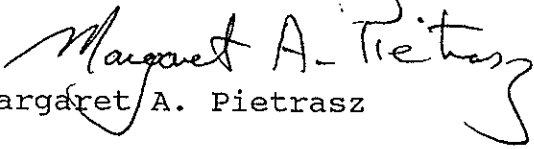
PRC will begin offering its assistance to local communities within the next six months, and will continue to offer this assistance over the following eighteen months. The estimated cost is \$9,500.

If the above environmentally beneficial expenditures are acceptable to EPA, PRC understands that they will be incorporated into a Consent Agreement and Final Order, and that PRC will be required to report the actual cost of these expenditures to EPA after they are completed.

If you have any questions regarding the above, please do not hesitate to contact me.

Very truly yours,

JAFFE, TRUTANICH, SCATENA & BLUM


Margaret A. Pietrasz

156-374
enclosure

cc: John Markley
Kathleen Tripple